Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Comprehensive Review of Universal Service Fund Management, Administration, and Oversight	))	WC Docket No. 05-195
	)	
Federal State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Schools and Libraries Universal Service Support Mechanism	))	CC Docket No. 02-6
	)	
Rural Health Care Support Mechanism	)	WC Docket No. 02-60
	)	
Lifeline and Link-Up	)	WC Docket No. 03-109
	)	
Changes to the Board of Directors for the National Exchange Carrier Association, Inc.	))	CC Docket No. 97-21

To: The Commission

REPLY COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC.

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SUMMARY

There is no question that the universal service system is broken and needs comprehensive reform. The record and a Bipartisan Staff Report for the House Committee on Energy and Commerce regarding the E-Rate program, released just as initial comments were filed in this proceeding, further demonstrate the severity of the problem.

There is broad consensus that the universal service fund is growing unsustainably large. In order to check the fund's growth in a rational way, the Commission must adopt meaningful performance measures with which to gauge the fund's success. These performance measures must focus on the *outcomes* that the programs are intended to achieve (which the Commission has never defined in a concrete way), and the *efficiency* with which the programs achieve those outcomes.

There is also widespread concern with the weak administration and oversight of the program. USAC should be retained as the administrator, but its processes should be more transparent and efficient. Also, more significant responsibility should be given to other government agencies with core competencies in the relevant areas, such as the Department of Education for the E-Rate program.

The universal service program should reflect Congress's commitment to the important goals enumerated in section 254. To successfully reflect these goals going forward, the Commission must undertake significant reform efforts now.

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To: The Commission

REPLY COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC.

Qwest Communications International Inc. ("Qwest") hereby submits the following reply comments in the above-captioned proceeding regarding comprehensive reform of the administration of the universal service support mechanisms.[1] In Qwest's initial comments, it demonstrated that the existing universal service system is broken and must be comprehensively reformed. Qwest proposed specific changes to improve efficiency, management, and oversight. These included recommendations to control the unsustainable growth of the size of the fund,

[1] *See Comprehensive Review of Universal Service Fund Management, Administration, and Oversight*, WC Docket No. 05-195, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, 20 FCC Rcd 11308 (June 14, 2005).

more clearly define the system's goals and purpose, improve administration and oversight, and shift certain responsibilities to other entities with greater competency in the relevant areas.

Given the breadth of this proceeding, the comments filed were extensive and wide-ranging. In these reply comments, Qwest refines its reform proposals and places them in the context of this broader record.

I. THERE IS BROAD AGREEMENT THAT THE UNIVERSAL SERVICE SYSTEM IS BROKEN AND MUST BE REFORMED

The evidence is mounting that the universal service program currently faces enormous problems and must be comprehensively reformed.[2] On the day that the initial comments were filed in this proceeding, the Subcommittee on Oversight and Investigations of the House Committee on Energy and Commerce issued a Bipartisan Staff Report on the E-Rate program finding that the program "is extremely vulnerable to waste, fraud, and abuse, is poorly managed by the FCC, and completely lacks tangible measures of either effectiveness or impact."[3] Similarly, the Federal Communications Commission's ("Commission" or "FCC") 2004 Report to Congress on Improper Payments concluded that the "FCC is not yet in a position currently to provide statistical conclusions concerning the rate of improper payments in the USF Schools and Libraries and High Cost Support Programs" because the Commission simply does not know, nor does it yet have the ability to know, the extent of third-party waste, fraud, and abuse in these two

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[2] *See* Qwest comments at 1-7. (All references herein to parties' comments, without further definition, refer to the initial comments filed in response to this notice on or about October 18, 2005.)

[3] *Waste, Fraud, and Abuse Concerns With the E-Rate Program*, Bipartisan Staff Report for the Use of the House Committee on Energy and Commerce, Subcommittee on Oversight and Investigations (Oct. 18, 2005) *("House Subcommittee Report")* at 3.

largest components of the program.[4] Given these fundamental problems, as the Delaware PSC observes, to focus in this proceeding merely on improving the existing programs, without revisiting more fundamental universal service policy decisions, would be "akin to repairing the screens when the leaking roof is in danger of giving way."[5] Indeed, the sheer diversity and volume of the proposals for change contained in the initial comments is a testament to the depth of the need for reform.

As discussed in greater detail in the remaining sections of these comments, there are several core problems that must be addressed. First, the universal service fund is becoming unsustainably large. The ballooning size of the fund threatens the worthy goals of section 254 and creates an unreasonable drag on the telecommunications sector as a whole. Further, the universal service system currently suffers from a lack of clarity as to its goals or purpose. The Commission has yet to identify how it will quantify and measure, for each universal service program, what success means or whether such success has been achieved. Weak oversight and management also plagues the universal service program. Despite sincere efforts on the part of the Commission and the Universal Service Administrative Company ("USAC"), there remain serious problems with inefficiency, waste, fraud, and abuse. Universal service administration would be improved by shifting some key responsibilities to governmental entities other than the FCC. Finally, the current universal service system (particularly the high cost support system) is

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[4] Report to Congress on Improper Payments (March 31, 2004) at 1.

[5] Delaware PSC comments at 2. *See also* SBC comments at 3 (urging the Commission not to be distracted by minor administrative reforms away from the need for fundamental reform of universal service policy).

inconsistent with today's marketplace. Larger carriers are expected to cross-subsidize high-cost areas with revenue from low-cost areas, but competition has made this impossible.

Despite the problems inherent in the current implementation, universal service reflects Congress's commitment to the important goals identified in section 254.[6] Because of the importance of the objectives, it is incumbent on the Commission to ensure that the system is implemented in an effective manner. This proceeding presents an opportunity to define the parameters of the Commission's universal service goals more precisely and to pursue them more efficiently.

II. THE RECORD SUPPORTS THE NEED FOR THE COMMISSION TO TAKE STEPS TO CONTROL THE SIZE OF THE FUND

As a number of commenters recognize, one of the greatest current threats to the achievement of universal service goals is the size of the fund itself,[7] which is already nearly unsustainable and drags down consumer welfare in the telecommunications sector.[8] As Qwest

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[6] 47 U.S.C. § 254(b). Section 254(b) identifies the following universal service principles: (1) quality service at just, reasonable, and affordable rates; (2) access to advanced telecommunications and information services in all regions of the nation; (3) access by consumers in rural and high-cost areas, and low-income consumers, to services that are reasonably comparable in quality and price to those available in urban areas; (4) equitable and non-discriminatory contributions from all providers of telecommunications service; (5) specific, predictable, and sufficient support mechanisms; (6) access to advanced telecommunications services by schools, libraries, and rural health care providers; and (7) such other principles as the Joint Board and the Commission adopt. The Commission has adopted the additional principle of competitive neutrality (*see*, *e.g.*, *In the Matter of Federal-State Joint Board on Universal Service; Schools and Libraries Universal Service Support Mechanism; Rural Health Care Support Mechanism; Lifeline and Link-Up*, CC Docket Nos. 96-45, 02-6, WC Docket Nos. 02-60, 03-109, Order, FCC 05-178 (Oct. 14, 2005), at ¶ 33).

[7] *See, e.g.,* Qwest comments at 4; Verizon comments at 3; New Jersey BPU comments at 2-3; New Jersey Division of the Ratepayer Advocate comments at 11.

[8] *See, e.g.,* Mercatus Center comments at 11.

argued in its comments, the cost of the overly large fund places economic strains on consumers,[9] who face ever-increasing pass-through charges (for explicit support) and higher rates (for implicit support). As the New Jersey Division of the Ratepayer Advocate points out, "[t]he astronomical growth of the high cost fund (and the entire USF) during a period of declining costs in the telecommunications industry is troubling for consumers who ultimately foot the bill."[10] Further, as Verizon argues, "[t]he overall size of the universal service fund is growing to levels that could threaten two of the primary goals of the universal service program: sustainability of the fund, and affordability of telecommunications services for all Americans."[11]

The Commission should take immediate steps to control the size and growth of the fund. Most importantly, the high cost fund should be capped at the 2004 level.[12] Support also should be limited to at most one line per eligible telecommunications carrier ("ETC") per household.[13] The Commission also should consider whether the $2.25 billion cap on the E-Rate fund should be lowered over time, now that the goal of connecting the nation's schools to the Internet has

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[9] Qwest comments at 4.

[10] New Jersey Division of the Ratepayer Advocate comments at 6-7.

[11] Verizon comments at 2-3 (reference omitted). Predictably, net recipients of support (including rural ILECs, their consultants, and educational organizations) generally did not draw attention to this problem in their comments.

[12] Comments of Qwest Communications International Inc., CC Docket No. 96-45 (filed with Joint Board Sept. 30, 2005) ("Qwest High Cost Proposals Comments") at 12. *See also* The Progress & Freedom Foundation, Digital Age Communications Act, Proposal of the Universal Service Working Group, Release 2.0 (Dec. 2005) at 3 (proposing an overall cap on the federal universal service fund). In the Joint Board proceeding, Qwest also argues that high cost support should be reallocated more equitably among the states. Qwest High Cost Proposals Comments at 15; *see also* New Jersey BPU comments at 4.

[13] Qwest High Cost Proposals Comments at 13.

been largely achieved.[14] The adoption of comprehensive performance measures, discussed in the next section, also should help control the growth of the fund over time.

III. COMMENTS SUPPORT THE NEED FOR CLEAR GOALS AND USEFUL PERFORMANCE MEASURES FOR THE SPECIFIC UNIVERSAL SERVICE PROGRAMS

As Qwest argued in its initial comments, a significant impediment to the effectiveness of the existing universal service system is the lack of specific goals for each type of support.[15] As the House Subcommittee Report concluded regarding E-Rate, "the FCC did not develop performance goals and measures that could be used to assess the specific impact of this spending and to improve the management of the program."[16] The Report calls this "a profound failure in the FCC's responsibility and accountability to Congress, which in the end must answer to American taxpayers about the value and direction of the E-rate program."[17]

While the House Subcommittee Report focused on the E-Rate program, the utter lack of performance measures is a problem with respect to all of the universal service programs. The Commission simply must decide what goal each program is trying to achieve. For example, if connectivity is the goal, it appears that the high cost program may not be making any progress despite its dizzying growth, while the E-Rate program may have reached that goal. As Qwest observed in its comments, telephone subscribership has remained flat.[18] In contrast, in the E-Rate

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[14] *House Subcommittee Report* at 48-49 (100% of all public schools and 93% of all public school instructional classrooms had Internet access by 2003).

[15] *See, e.g.,* Qwest comments at 15; GCI comments at 5.

[16] *House Subcommittee Report* at 48 (footnote omitted).

[17] *Id.* at 49.

[18] *See* Qwest comments at 4. Although the most recent FCC report shows a slight increase in subscribership over the prior period, the current subscribership level of 94% is the same as it was in 1997 when the universal service provisions of the 1996 Act were implemented, and has fallen

(continued on next page)

context 100% of all public schools and 93% of all public school instructional classrooms already had Internet access by 2003, raising the question of whether the program has achieved connectivity and should be scaled back.[19] The Commission has never stated, however, that connectivity is the goal that either of these programs is designed to achieve. Thus, the Commission needs to assess with specificity what objectives each program now is designed to advance.

Qwest's initial comments contain specific recommendations regarding performance metrics for each aspect of the universal service program generally, and for USAC in particular,[20] and Qwest will not reiterate those points here. Significantly, however, any performance metrics selected should focus on the use of support to achieve relevant goals. The comments of the Mercatus Center at George Mason University[21] include a thoughtful discussion of economic analyses showing that adopting effective performance measures is actually *more* important than administrative improvements or the prevention of waste, fraud, and abuse. Efficient programs are still wasteful if their goals are unclear, and avoiding unlawful expenditures does little good if lawful expenditures fail to accomplish the program's goals.[22] The Mercatus Center also argues

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from a high of 95.5% in March 2003. *Telephone Subscribership in the United States,* Industry Analysis and Technology Div. (Nov. 2005), Table 1 at 6.

[19] *House Subcommittee Report* at 48-49.

[20] Qwest comments at 15-22.

[21] The Mercatus Center is a research center at George Mason University that seeks to apply "market-based tools and analysis to discover workable solutions to pressing economic and governmental problems," with a specific interest in governmental effectiveness and accountability. *See* www.mercatus.org. Their comments were authored by Senior Research Fellow, Jerry Ellig, and Maurice McTigue, the former Minister of State-Owned Enterprises who oversaw the privatization of the incumbent carrier in New Zealand.

[22] Mercatus Center comments at 2-3.

effectively that performance measures should focus on the *outcomes* the programs are intended to achieve,[23] and should consider the *efficiency* with which they reach the desired outcomes.[24] In other words, the performance measures should determine both whether the programs achieve their goals *and* the extent to which they do so per subsidy dollar.[25]

In this latter regard, the Mercatus Center comments point to studies showing that the existing high cost and low-income programs are extraordinarily inefficient at achieving their apparent goals (taking account of the fact that such goals have never been clearly defined).[26] For example, one study found that the cost of adding each additional subscriber through high cost loop support was $11,000 per subscriber in 2000.[27] Only through the establishment of meaningful metrics can rational cost-benefit analysis be conducted.

USAC argues, in contrast, that the Department of Education's Enhancing Education Through Technology ("EETT") guidelines would *not* be appropriate metrics because "the mission of USAC is to collect monies, process applications, and disburse funds, as opposed to measuring the improvement of academic achievement, which is the objective of the EETT program."[28] USAC's comment suggests that the program's success should be measured primarily based on the amount of support or the efficiency with which it is distributed. While efficiency of distribution may be an appropriate performance metric for *USAC* as the program administrator,

[23] *Id*. at 4-10.

[24] *Id*. at 9-16.

[25] *Id.*

[26] *Id*. at 13-16.

[27] *Id.* at 13.

[28] USAC comments at 90. *Cf.* Qwest comments at 17-18 (arguing that EETT Accountability Measures could be a useful model for the universal service program).

that is no substitute for appropriate performance metrics for the *program* as a whole.[29] To be meaningful, program metrics must be firmly rooted in the core purposes of universal service.[30] They cannot simply measure the program's effectiveness at handing out money.[31]

Qwest proposed in its initial comments that performance measures, particularly for the E-Rate program, might best be developed through a series of forums involving all affected stakeholders.[32] Other commenters proposed task forces or other similar mechanisms.[33] The Commission should consider this type of approach for the development of meaningful performance measures for the universal service programs, which are essential to their success.

IV. THE COMMISSION SHOULD TAKE SPECIFIC MEASURES TO IMPROVE THE CURRENT WEAK ADMINISTRATION AND OVERSIGHT OF THE UNIVERSAL SERVICE PROGRAM

There is broad recognition among the commenters that weak administration and oversight plagues the universal service program. A majority of commenters, for example, agree that USAC's procedures should be made publicly available,[34] and communication between USAC and the FCC should be improved.[35] In addition, many commenters shared Qwest's concerns

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[29] *See, e.g.,* USAC comments at 87 ("now that connectivity appears to have become essentially ubiquitous in most areas, … the time is right to focus on the quality of the connectivity and its impact on education.").

[30] *See* 47 U.S.C. § 254.

[31] *See, e.g., House Subcommittee Report* at 11-20 (discussing how increases in funding to the Puerto Rico Dept. of Education went to waste, fraud, and abuse rather than serving the goals of the program).

[32] Qwest comments at 23.

[33] *See, e.g.,* Alexicon comments at 9 (proposing a task force).

[34] *See, e.g.,* Qwest comments at 9-13; BellSouth comments at 4-6; CTIA comments at 3-4; Centennial comments at 6; Dobson comments at 7; GVNW comments at 8-9; IDT comments at 3-5; SBC comments at 4-5; Sprint Nextel comments at 4.

[35] *See, e.g.,* NTCA comments at 4-5.

about the unnecessary opaqueness of USAC's billing and disbursement statements.[36] The quarterly contribution factor, too, should be released further in advance; the existing target release date, only 14 days before the beginning of each quarter, gives carriers insufficient time to update systems, provide customer notice, and revise tariffs.[37] Requiring the electronic filing of Form 499-Q, as proposed by USAC,[38] would help in this regard.

At least one other commenter also raised Qwest's point that USAC should be managed and staffed by people with experience in financial management, project management, and systems efficiency.[39] Other comments also support the idea of a single point of contact to help resolve carrier problems with USAC, similar to Qwest's proposal for a USAC ombudsman with broad responsibility.[40]

The comments also demonstrate concern with the current application of the Commission's Red Light rules by USAC in the current contribution program.[41] Recognizing that the current system results in the inadvertent "red-lighting" of many carriers solely as a result of administrative error, some commenters proposed that a "yellow light" system should be implemented.[42] The "yellow-light" indicator would be an intermediate step that would flag

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[36] *See, e.g.,* Qwest comments at 11; BellSouth comments at 16; Centennial comments at 3; CenturyTel comments at 7; GCI comments at 35.

[37] Qwest comments at 13-14; Dobson comments at 8.

[38] USAC comments at 67. To place more burdens on carriers by requiring earlier filings of Form 499-Q, as USAC also suggests, *id.,* would be counterproductive and simply impose greater and unrealistic burdens on contributors.

[39] BellSouth comments at 5-6. *See also* Qwest comments at 10.

[40] Qwest comments at 12-13; CenturyTel comments at 6.

[41] *See, e.g.,* Qwest comments at 11; CenturyTel comments at 5-6; NECA comments at 22.

[42] *See, e.g.,* CenturyTel comments at 5-6.

carriers with potential delinquencies and allow a reasonable but brief period of time for documents to be reconciled between the carrier and USAC before the carrier is put into "red-light" status, if appropriate.[43] A "yellow light" system has merit and should be explored further to reduce delays associated with the errors in the administrative process.

There also is concern about delays in USAC's processing of applications and, more importantly, handling of appeals.[44] Qwest agrees that firm deadlines (and not merely targets, as USAC suggests[45]) should be established for USAC's handling of appeals, with automatic referral to the FCC after a reasonable period has expired.[46]

V. CERTAIN UNIVERSAL SERVICE PROGRAMS WOULD BE BETTER ADMINISTERED BY OTHER ENTITIES

Qwest argued in its initial comments that some aspects of the universal service program would be better administered by other agencies or entities, given the FCC's relative lack of subject-matter and procedural expertise with subsidy programs.[47] For example, the Department of Education should have a greater role in the E-Rate program, and the Department of Health and Human Services should have greater responsibility for the rural health care program. This is especially true if the goals of those programs are to improve the education of our children and general populace, and to improve the health care services provided in rural areas. The Department of Education and the Department of Health and Human Services should already have

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[43] *See, e.g., id*. at 5.

[44] *See, e.g., id*. at 8; Dobson comments at 8; Florida PSC comments at 8; GCI comments at 4, 25; NECA comments at 18-19; Sprint Nextel comments at 13-14.

[45] USAC comments at 122-23.

[46] Qwest comments at 12.

[47] *Id*. at 5.

expertise in measuring achievement in these areas. Similarly, state commissions should have a larger role in the allocation of high cost support within the states. Qwest believes that these important reforms merit further attention.[48]

VI. CONCLUSION: UNIVERSAL SERVICE IS IMPORTANT AND SHOULD BE REFORMED

Although sweeping reform of the universal service program is urgently needed, the statutory universal service goals identified in section 254[49] are important and worth achieving. Qwest wholeheartedly supports these goals; indeed, it is precisely to ensure that the USF is able to preserve them that Qwest advocates reform in this proceeding. Qwest urges the Commission to take the steps outlined in this and Qwest's initial filing.

Respectfully submitted,

By: /s/ Tiffany W. Smink

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December 19, 2005

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[48] *See, e.g.,* Florida PSC comments at 8 (advocating an increased state role in allocating support and resolving initial appeals).

[49] 47 U.S.C. § 254.

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC.** to be 1) filed with the FCC via its Electronic Comment Filing System, 2) served, via email on Mr. Warren Firschein, Access Policy Division, Wireline Competition Bureau, Federal Communications Commission at warren.firschein@fcc.gov, 3) served, via email on Ms. Mika Savir, Access Policy Division, Wireline Competition Bureau, Federal Communications Commission at mika.savir@fcc.gov, 4) served, via email on the FCC's duplicating contractor Best Copy and Printing, Inc. at FCC@bcpiweb.com., and 5) served via First Class United States mail, postage prepaid, on the parties listed on the attached service list.

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